

## **REMARKS/ARGUMENTS**

Claims 1, 9, 12 and 16 have been rejected under 35 USC 103 (a) as being unpatentable over Baker et al. in view of McCullough et al. The examiner has stated that Baker et al. disclose drilling rig 22 having a power source 42 attached to a rotatable reel 18, coiled flexible tubing drill pipe 16, drill bit 14, injector unit drive mechanism 20 adjacent the reel, and a conduit 26 positioned adjacent the drive. However, Baker et al. do not disclose a container for reel 18. The examiner further states that McCullough et al. show a container 9 for a reel having a non-vertical axis of rotation used in a system to move a well tool T. Finally it is stated it would be obvious to a person having ordinary skill in the art at the time the invention was made to encase the Baker et al. reel in a container, as shown by McCullough et al. to equalize well pressure (col.2, lines 32 through 33).

Claim 1 has been amended to more distinctly claim the unique structure of the pipe container of the instant invention. Support for this amendment may be found in paragraph [0027] that describes rotation of the container 24 to rotate the drill pipe 60 and drill bit 90 and Figures 1, 5, 8, 10 and 11. Neither the Baker nor McCullough art have a reel oriented to rotate the pipe when the reel is rotated. The reel merely serves as an extend and retrieve mechanism. Also, the McCullough art may have a reel container for equalizing well pressure, but this does not anticipate or disclose a reel container oriented to rotate a pipe on the longitudinal axis. The Baker and McCullough reels are not designed nor could they be used to axially rotate the drill pipe. For these reasons it is believed claim 1 as amended is distinguishable from the cited art.

Claim 9, 12 and 16 are dependent on what is now believed to be an allowable base claim and therefore should be allowed.

Claims 2 and 3 have been rejected under 35 USC 103 (a) as being unpatentable over Baker in view of McCullough as applied to claim 1 above, and further in view of Driver. Claims 2 and 3 are dependent on what is now believed to be an allowable base claim and therefore should be allowed.

Claims 4 through 7 have been rejected under 35 USC 103 (a) as being unpatentable over

Baker in view of McCullough and Driver as applied to claim 3 above, and further in view of Cherry. Claims 4 through 7 are dependant on what is now believed to be an allowable base claim, claim 1 ultimately, and therefore should be allowed.

Claim 8, 10, 11 and 13 through 15 have been objected to as being based upon a rejected base claim. Claim 1 is now believed to be allowable and therefore these claims should be allowed.

Claim 23 through 27 have been allowed.

It is believed with the clarifying amendments that the uniqueness of the instant invention is not disclosed in the cited art. Applicant believes that the unique solution was not obvious to those involved in the art of earth drilling and boring systems design.

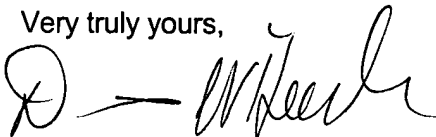
Accordingly it is believed that the rejections under 35 USC Section 103 (a) have been overcome by amending of the claims and the remarks, and withdrawal thereof is respectfully requested.

In view of the above, it is submitted that the claims are in condition for allowance. Reconsideration of the cause for rejections and objections is requested. Allowance of claims 1 through 16 and 23 through 27 is earnestly solicited.

No additional fee for claims is seen to be required.

If you have any questions do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Dennis W. Beech', with a stylized initial 'D' and a long horizontal stroke.

DENNIS W. BEECH  
Reg. No.: 35,443

DWB/ab